UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
SEATTLE, WASHINGTON 98101

MAY 12 1988

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REPLY TO ATTN OF: M/S ES-098

MEMORANDUM

SUBJECT: RCRA Compliance Inspection at Rhone-Poulenc Inc., Seattle, Washington
EPA I.D. No. WAD009282302

FROM: Jim Pankanin, Environmental Engineer
Engineering & Investigations Section

TO: Chuck Rice, Chief
RCRA Compliance Section

THRU: Paul A. Boys, Chief
Engineering & Investigations Section

FILE COPY

Facility Review:

On March 31, 1988, I conducted a RCRA Compliance inspection at Rhone-Poulenc, Incorporated. Rhone-Poulenc is located on the Duwamish River at 9229 East Marginal Way, in Seattle, Washington, 98108. At the facility, I presented my credentials to Bruce Pallante, plant manager and Gary Podrabsky, technical services superintendent. Rhone-Poulenc bought this facility from the Monsanto Company effective October 1, 1986. The facility has operated at this location since 1948. Approximately 71 employees currently work at this facility. The main product is vanillin, which is extracted from spent sulfite waste liquor from a pulp mill. The most recent RCRA inspection report from this facility that is included in the EPA file was conducted on July 23, 1981, by Julie Sellick of Ecology.

Gary Podrabsky explained that the facility has an NPDES permit for discharge of non-contact cooling water. Additionally, the facility discharges some process wastewater to the Seattle Metro system. This wastestream is monitored for toluene and metals, specifically copper. Gary Podrabsky also stated that there are currently no underground storage tanks and only one underground pipe in use at the facility. He explained that the facility only burns natural gas as fuel, and has never burned waste oils or hazardous wastes for energy recovery. Podrabsky also explained that there is no known PCB equipment at the facility. On October 10, 1986, shortly after the facility changed ownership, Rhone-Poulenc notified Ecology of its intent to close its hazardous waste storage area and operate as a generator (less than 90 day storage) only. Rhone-Poulenc is currently operating as a hazardous waste generator, and does not allow any of the wastes in the storage area to accumulate over 90 days. Neither EPA nor Ecology has taken action regarding the closure request to date.

Observations:

Gary Podrabsky escorted me on a tour of the facility. We first inspected the outdoor hazardous waste storage area. Rhone-Poulenc has interim status for hazardous waste storage of 100 gallons in containers and 4500 gallons in tanks. There were no hazardous or dangerous wastes (as defined by Ecology) in storage at this unit on the day of the inspection. The hazardous waste storage area is roofed and bermed. All drainage would be contained in a sump which feeds back to the process water. There were fire extinguishers and warning signs in the area. Photographs of the facility tour were taken and will be retained with this report original in the EPA Region 10 Compliance file. There were about ten large, wooden, open crates containing waste vanillin still bottom (VSB) material which is sold as a fuel to a local cement kiln. These materials were being stored in the cement bay next to the hazardous waste storage area. I checked the log book which serves as an operating record for the hazardous waste storage area. Most of the waste that is stored in this area is strainer solids contaminated with copper from vanillin manufacturing. The copper levels are high enough to classify this waste stream as WT01 under Ecology regulations. Based on 1980 analytical results included in the waste analysis plan, this wastestream would not be regulated under RCRA.

Next we inspected the emergency spill equipment storage area. Gary Podrabsky stated that this equipment is inventoried weekly. There was a good supply of sandbags, overpack drums, absorbents, shovels and brooms available. We then proceeded to inspect three different hazardous waste generation points. The first generation point was an open hopper partially filled with strainer solids (WT01). This hopper was located just next to the tanks where the waste material is generated. The second generation point is the laboratory where spent methylene chloride (F002) is generated at the rate of 220 pounds per year, according to the 1987 dangerous waste report. This waste was stored in a labeled closed drum stored on a pallet in a bermed area. The last and largest generation point was the tank where the vanillin black liquor solids (VBLS) are stored until the material is shipped offsite. This waste is shipped via tank truck to CSSI in Arlington, Oregon several times a week. According to the 1987 dangerous waste report, Rhone-Poulenc generated over 19 million pounds of this waste and, according to Gary Podrabsky, shipped it all to CSSI for thickening and neutralization in the CSSI evaporation ponds prior to landfilling. This VBLS is a characteristic hazardous waste (D002) with a pH of 12.3 to 12.8.

Document Review:

I obtained copies of the Rhone-Poulenc waste analysis plan, contingency plan, closure and post closure plan, personnel training plan and 1986 and 1987 annual dangerous waste reports. The closure and post-closure cost estimates were most recently updated by Monsanto in March, 1986, prior to the purchase

of the facility by Rhone-Poulenc. A financial test and corporate guarantee for closure was provided by Monsanto (March 1986) for the amounts of $34,000 for closure and $11,000 for post-closure. The August, 1986, closure plan prepared by Monsanto estimated the closure costs to be $16,885. No post-closure cost estimate was provided, since a clean closure was planned. Rhone-Poulenc has not prepared its own financial test documentation or updated its closure cost estimate.

I also reviewed the manifest file at Rhone-Poulenc. Manifests were retained for over three years. The manifests appeared to be properly filled out and managed. Facility personnel were very cooperative and helpful throughout the inspection.

Attachments

Rhone-Poulenc Inc.
3/31/88 Photo Log

1. Warning sign at waste drum storage area.

2. Crates of vanillin still bottoms. Not a dangerous waste.

3-4. Emergency spill response equipment.

5. Parts cleaner in maintenance shop.

6. Strainer solids waste containing soluble copper.

7. Hopper holding strainer solids waste.

8-9. Labled drum containing waste methylene chloride from laboratory.

10. Large tank containing vanillin black liquor solids (D002).

11. Large tank containing vanillin black liquor.